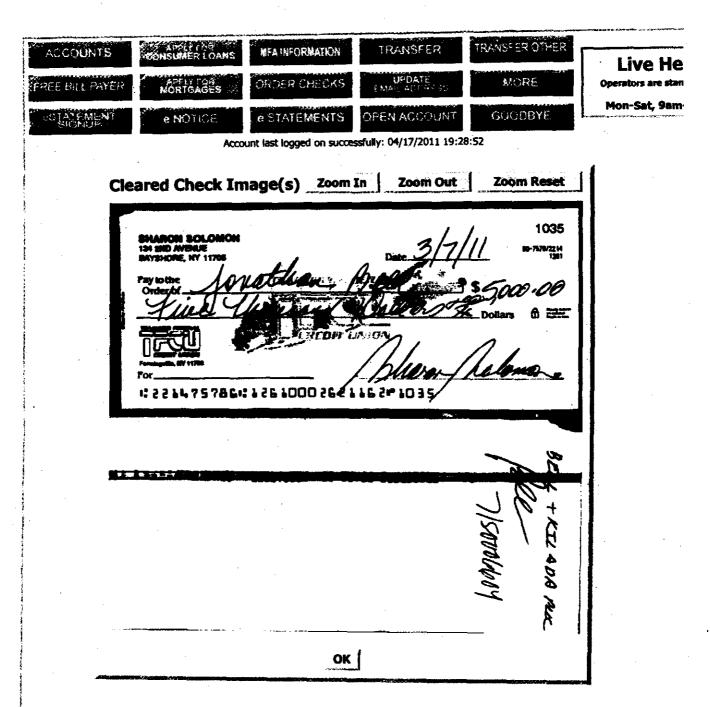
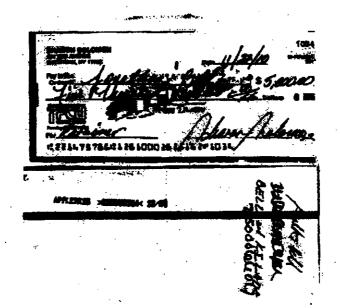


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# INVOICE

**Sharon Solomon** 

Attn:

### Invoice 20010

· Date	Feb 10, 2011
Terms	N/A
Service Thru	Feb 10, 2011

#### In Reference To: Title VII Case (Labor)

Date	By Services	Hours	Rates	Amount
01/14/2010	AT Draft: Draft court order / ECF filing. Invoice review / Conf. Opposing counsel	0.80	\$250.00/hr	\$200.00
10/12/2010	AT Review: File review at Ira Neman office	5.50	\$250.00/hr	\$1,375.00
11/29/2010	AT Documentation: procedural case history review/ prep for court appearance	1.30	\$250.00/hr	\$325.00
12/01/2010	AT Documentation: Transcript review	2.40	\$250.00/hr	\$600.00
12/09/2010	AT Documentation: Causes of Action / complaint review / affidavits	3.70	\$250.00/hr	<b>\$925.0</b> 0
12/13/2010	AT Correspondence: Conf. opposing counset	0.30	\$250.00/hr	\$75.00
01/03/2011	AT Meeting: Conf. Bell / Kilada / Legal Standards / Causes of action	0.30	\$250.00/hr	\$75.00
01/10/2011	AT Correspondence: Conference Client	0.10	\$250.00/hr	\$25.00
01/10/2011	Research: Retrieve and Review PACER for procedural history of case; Review AT Magistrate's Order granting in part, and denying in part, P's motion to Amend complaint; Review Amended Complaint with all of the Accompanying Exhibits and Amended Answer	4.40	<b>\$250.00/h</b> r	\$1,100.00
01/11/2011	Research: Preliminary Research and Outline Legal Standards in the 2nd Circuit AT for 1983 claims; ADA & NYSHRL Disability claims; Retaliation claims, & race and gender claims	2.70	\$250.00/hr	\$675.00
01/25/2011	Review: Review and outline matters relating to the following: P's SDHR Race and Gender Complaint and all Exhibits; District's Position Statement responding to Race and Gender Complaint; P's Rebuttal to Race and Gender AT Complaint; SDHR finding of Probable Cause in Race and Gender Complaint; SDHR Final Investigation Report and Basis of Determination for Race and Gender Complaint; Complaint Report Event History for Race and Gender Complaint; SDHR file re: Race and Gender Complaint	3.20	\$250.00/hr	\$800.00
01/26/2011	AT Meeting: Conf Client / Conf opposing counsel / case theiry	0.50	\$250.00/hr	\$125.00
01/ <b>26/2011</b>	Review: Review and outline matters relating to following: P's SDHR Retaliation and ADA Complaints and all exhibits; District's Position Statements responding to Retaliation and ADA Complaints; P's Rebuttal to Retaliation and ADA AT Complaints; SDHR finding of Probable Cause in Retaliation and ADA Complaints; SDHR Final Investigation Report and Basis of Determination for Retaliation and ADA Complaints; Complaint Report Event History for Retaliation and ADA Complaints; SDHR file re: Retaliation and ADA Complaints	4.40	\$250.00/hr \$	\$1,100.00

# INVOICE

Sharon Solomon

Attn:

Date	Feb 10, 2011
Terms	N/A
Service Thru	Feb 10, 2011

1/5/2011	Balance Adjustment	. Singer sasaribase	(\$	5,000.00)
Payment I	History: Type	Payment Description	• .	Amount
	I Hada	Baiance (Amount	Due)	\$9,925.00
		Previous Bal	lance	\$0.00
·		Total Invoice Am	ount \$	14,925.00
		Total Expe	nses	\$0.00
	•	Total L	abor \$	14,925.00
		Total F	iours	59.70 hrs
02/07/2011	AT Review: Review and outline Jac	zunksi deposition 3.	80 \$250.00/hr	\$950.00
02/04/2011	AT Research: Continue to Review I thereto, Continue to outline Plain	Plaintiff's Deposition and all Exhibits cited 4.	90 <b>\$2</b> 50.00/hr	\$1,225.00
02/03/2011	AT Review: Review Plaintiff's Depo Plaintiff's Deposition	sition and all Exhibits cited thereto; outlined 3.	70 \$250.00/hr	\$925.00
02/02/2011	AT Review: Review and outline Jer	nnifer Lancaster deposition 5.	60 \$250.00/hr	\$1,400.00
02/02/2011	AT Meeting: Conf opposing couns	al / Deposition ? Settlement discussions 0.	70 <b>\$2</b> 50.00/hr	\$175.00
02/01/2011	AT Review: Review and digest Nic	olas Dyno Deposition 2.	90 <b>\$</b> 250.00/hr	\$725.00
01/31/2011	AT Review: Review and digest Fra	zier deposition 5.	20 \$250.00/hr	\$1,300.00
01/28/2011	Claims for Race & Gender, Reta AT Materials including: Notices re:	case folders related to the following: Notice of aliation, and Disability Claims; SDHR Inception consolidation of Complaints; Hearing Requests assets for Investigative Files; Review Plaintiff's	.30 \$250.00/hr	\$825.00

# INVOICE

Sharon Solomon

Attn:

### Invoice 20020

Date	Apr 08, 2011
Terms	N/A
Service Thru	Apr 08, 2011

In Reference To: Title VII Case (Labor)

Date	By Services	Hours	Rates	Amount
02/08/2011	AT Review: Review and outline Pitterson deposition	2.30	\$250.00/hr	\$575.00
02/0 <del>9/2</del> 011	<b>Draft:</b> Review P's discovery production, P. v. SUFSD BS #s 1-676 and AT miscellaneous D's discovery production; Prepare Memo to File based or materials reviewed thus far	5.50	\$250.00/hr	\$1,375.00
02/10/2011	Review: Review case folder related to the following: P's Economic Loss 3/09, Salary Guide for Teachers; Salary Statement, District's Payroll Summaries; Correspondence and Faxes from P to Counsel; Non-party witnesses Subpoenas and Notices of Deposition; Subpoenas and Subpo Ducem Tecum to Teacher's Union, and correspondence to Court regarding same; Documents re: Frazier and Rev. Dozier.	penas 1.00	\$250.00/hr	\$250.00
02/14/2011	AT Draft: Review and outline deposition testimony of Latisha Ellis	2.80	\$250.00/hr	\$700.00
02/1 <b>6/2</b> 011	Review: Review discovery production BS #s 1-405; 420 (in w/other evaluated AT 422-566; 567-876; P877-P882; 883-1074; P1075-1250; P143-P144; Confederation to File		\$250.00/hr	\$1,300.00
02/17 <i>/</i> 2011	Draft: Review discovery production BS #s 2000-2040 (Dr. Groth's record Review case folders related to the following matters: Defendant's Request Production; Plaintiff's Responses to Defendant's Responses to Production Defendant's First Set of Interrogatories; Defendant's Responses to Production of Documents; Plaintiff's Responses to Defendant's Requesterorgatories; Plaintiff's Rule 26 Disclosure Statement; Defendant's Rule Disclosure Statement; Correspondence re: defects in discovery exchang Defendant's Responses to P's Requests for Admission; Defendant's post AT Requests for Documents, Information, and Authorizations & Plaintiff's Responses to same; Motion to extend discovery; press releases; CVS in P's Witnesses; Witness Affidavits; Notice to admit; Review Motions/Applications & Oppositions to the following: unsworn VanCleef & protective order on subpoena for Union Representative Lissenden, motion quash depositions of 3 non-party witnesses, extending discovery; Review Judge's and Magistrate's decisions regarding the above Motions/Applications Review medical records in case folder; Memo to file regarding what document and the protective order records in case folder; Memo to file regarding what document and the protective order records in case folder; Memo to file regarding what document and the protective order records in case folder; Memo to file regarding what document and the protective order records in case folder.	sts for n; equests ests for le 26 ged; st EBT 4.20 nvoices; affidavit, n to w ations; uments	\$250.00/hr	\$1,050.00
02/22/2011	Draft: Review discovery production BS #s 677-1028 including, but not lir AT P's 50h hearing; Review Hartman, Garcia, and Gettling Affidavits; Contin Memo to File based on materials reviewed thus far		\$250.00/hr	\$1,000.00

# INVOICE

**Sharon Solomon** 

Attn:

Date	Apr 08, 2011
Terms	N/A
Service Thru	Apr 08, 2011

<b>Date</b> 3/9/2011	<b>Type</b> Payment - Check	Payment Description	(	<b>Amoun</b> ( \$5,000.00)
Payment His	story:	Balance (Amo	unt Due;	15,475.0
		Previous	Balance 9	12,350.00
		Total Invoice	Amount	\$8,125.00
		Total E	xpenses	\$0.00
		Tot	al Labor	\$8,125.00
		Tot	al Hours	32.50 hr
04/04/2011 A1	Correspondence: Magistrate opposing counsel	Conference / ecf filinf / fax chambers / conference	0.80 \$250.00/hr	\$200.00
04/04/2011 A	Draft: Telephone conference v postponement of certain dead	vith counsel for Defendant (Gereg). Draft letter re: lines as agreed.	1.40 \$250.00/hr	\$350.0
03/31/2011 A	Documentation: Conf opposition of trial order	ng counsel / Conference Judge chambers / pre	0.50 \$250.00/hr	\$125.0
03/21/2011 A	Deposition: Client Deposition	in office	3.80 \$250.00/hr	\$950.0
02/20/2011 A	Finalize memo to file &	outilio opioizituing laboro	1.00 \$250.00/hr	•

# INVOICE

## **Sharon Solomon** Attn:

Date	Jul 11, 2011
Terms	
Service Thru	Jul 11, 2011

	. · · · · · · · · · · · · · · · · · · ·	
05/26/2011 AT	Review: Review Frazier and Pitterson digested deposition testimony & incorporate into 58.1 statement	5.60 \$250.00/hr \$1,400.00
05/26/2011 AT	Other: Draft application to Judge / Conf. Co-counsel / Case theory Summary Judgement	1.40 \$250.00/hr \$350.00
05/31/2011 AT	Draft: Outline client's affidavit and Draft 56.1 statement incorporating deposition testimony from Plaintiff, Lancaster, and all the SDHR complaints and rebuttal statements.	7.20 \$250.00/hr \$1,800.00
96/01/2011 AT	Draft: Review Defendant's Statement of Material Facts para 1-77 and review each exhibit that was relied upon in Defendant's respective statements; Respond to Defendant's 56.1 statement para 1-77 citing and cross-referencing admissible testimony and exhibits; draft list of questions for client; tel-con with client going over strategy in this case.	5.00 \$250.00/hr \$1,250.00
06/02/2011 AT	Draft: Review Defendant's Statement of Material Facts para 77-202 and review each exhibit that is relied upon in Defendant's respective statements; Respond to Defendant's 56.1 statement para 78-202 citing and cross-referencing admissible testimony and exhibits; send additional questions to client	7.30 \$250.00/hr \$1,825.00
06/03/2011 AT	Draft: Review client's responses to my questions and incorporate same into her affidavit; continue to draft 56.1 counterstatement; incorporate matters from Staudte, VanCleef, Thomas, Ellis witness deposition transcripts & Hartmann, Garcia, and Gettling affidavits to demonstrate proof of Prima Facie case, pretext, and genuine issue of fact into 56.1 statement.	7.00 \$250.00/hr \$1,750.00
	Draft: Review client's responses to my 2nd set of questions and incorporate same into her affidavit; Finalize responses to Defendant's 56.1 Statement; Perform Legal Research regarding the types of adverse action that Client suffered and incorporate legal research into Memorandum of Law; Draft argument section of brief	7.20 \$250.00/hr \$1,800.00
06/05/2011 AT	Draft: Finalize 56.1 counter-statement; collate and gather exhibits; cross reference exhibits to 56.1 counter-fact statement and to response to Defendant's 56.1 statement; Finalize Client's Declaration and send for her review; Receive and review client's additions and tel-cal w/client discussing same; Incorporate Client's changes into her Declaration; Draft Bell Declaration	7.50 \$250.00/hr \$1,875.00
06/07/2011 AT	Other: ECF Filing / Case Conference	0.70 \$250.00/hr \$175.00
	Documentation: Judge order ecf	0.20 \$250,00/hr \$50.00

# INVOICE

Sharon Solomon Attn:

Date	Jul 11, 2011
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Service Thru	Jul 11, 2011

 			·
Reference	To: Title	VIII Casa	(Lebor
 	1411111	711 -	

Date	By Services	Hours .	Rates	Amoun
04/05/2011	AT Draft: Draft Statement of the Case; Draft Summary of Claims to be Tried; Draft Propositions of Law; Start to Draft propositions of fact	3.60 \$2	50.00/hr	\$900.00
04/06/2011	AT Draft: Continue to Draft Propositions of Fact; Review documents in case and start to draft Exhibit List	5.10 \$2	50.00/hr	\$1,275.00
04/07/2011	AT Draft: Continue to review documents in case and draft list of exhibits for use in pre-trial order; Draft Witness List	7.00 \$2	50.00/hr	\$1,750.00
<b>04/10/20</b> 11	Documentation: Cross Reference BS # listed on all Exhibits to those listed on AT the exhibit list; Collete and label all Exhibits listed on Exhibit List; Draft Memo to File re: Exhibit List.	5.70 \$2	50.00/hr (	\$1,425.00
04/11/2011	Review: Conference co -counsel / prep for court conference / Magistrate Lindsay / Exhibit objections	1.30 \$2	50.00/hr	\$325.00
04/12/2011	Court Time: Travel to / from Federal court Central Islip / Pretrial conference / Joint Pretrial order filed	2.10 \$2	50.00/hr	\$525.00
) <b>4/25/2</b> 011	Phone Call: Telephone conference with Defendant counsel re: discovery and pre-trial.	0:40 \$2	50.00/hr	\$100.00
)4/27/ <b>2</b> 011	Court Time: Pre-triel conference morning prep with attorney Bell and Kilada.  AT Pre-trial conference in Federal court with attorney Kilada and Krell. Pre-trial order. Travel to/from Federal court.	5.00 \$2	50.00/hr \$	1,250.00
<b>15/11/201</b> 1	Review: Review Feuerstein Rules and Local Rules regarding Summary  AT Judgment; Receive and review District's Memorandum of Law in Support of  Motion for Summary Judgment;	2.70 \$2	50.00/hr	<b>\$675.00</b>
<b>)5/12/201</b> 1 .	AT Draft: Outline Legal Theories For Memo of Law opposing Summary Judgment	2.00 \$2	50.00/hr	\$500.00
6/19/2011	AT Research: Perform legal research regarding issues related to TMJ	1.20 \$2	50.00/hr	\$300.00
<b>5/24/20</b> 11 /	Review: Outline 56.1 statement; Review digested deposition testimony of Jacunski and Dyno and incorporate same into 56.1 statement	4.50 \$2	50.00 <b>/</b> hr \$	1,125.00
)5/25/2011 <i>i</i>	Research: Perform Legal Research relating to 1983 claims and inferences of discrimination to include adverse treatment of members in the same protected class; Perform Research of Feuerstein SJ discrimination cases, including 56.1 statements & counterstatements, declarations and obtain memorandums of law	5.20 \$2	50.00/hr \$	1,300.00

# INVOICE

Sharon Solomon Attn: **Invoice 20037** 

Date	Jul 11, 2011
Terms	-
Service Thru	Jul 11, 2011

Draft: Finalize all cites to Client Affidavit in Statement of Facts; Cross reference all citations in Memorandum of Law to paragraphs in Statement of Facts; Finalize Brief and ensure that brief did not exceed page limit; Draft Table of 07/06/2011 AT Contents, and Table of Authorities; Cross reference both Table of Authorities and Table of Contents to the respective page numbers in the Memorandum of Law; Collate all papers for copying and service; Copy set of papers to be served

on Defendants; Serve papers on Counsel

6.70 \$250.00/hr \$1,075.00

Date	By	Expenses		·	Amount
06/30/2011	AT	Printing/Copying: copying and	1 printing Rule 56 motion		\$98.89
				Total Hours	101.60 hrs
				Total Labor	\$25,400.00
		•	•	Total Expenses	\$98.89
•		•		Total invoice Amount	\$25,498.89
				Previous Balance	\$8,050.00
				Balance (Amount Due)	\$28,548.89
Payment His	tory:				
Date 6/24/2011		ype ayment - Check	Payment Description	•	Amount (\$5,000.00)

#### Hi Joseph,

I apologize for not getting back to you sooner about the bill. Between my daughter's graduation and working with Elissa to complete the responses for the affidavit, I have been very busy.

I plan to give you a \$5,000 check on June 24th.

Below is the chart of the two invoices: 20010 and 20020 and what we have paid so far.

The discrepancy is that the previous balance on the 20020 invoice should have been \$4,925.00 and then when the \$8,125.00 is added on, the amount due should be 13,050.00 instead of 15,475.00. There appears a discrepancy of \$2,425.00. When we paid the next \$5000.00 check on April 28<sup>th</sup> that should give us a previous balance of \$8,050.00.

Date	CK #/ InV#	Payment	Invoice	Balance Due
				0
			\$0.00	\$0.00
11/22/2011	*1034	\$5,000.00		-\$5,000.00
2/10/2011	#20010		\$14,925.00	\$9,925.00
3/7/2011	*1035	\$5,000.00		\$4,925.00
				\$4,925.00
4/8/2011	#20020		\$8,125.00	\$13,050.00
				\$13,050.00
4/28/2011	*1036	\$5,000.00		\$8,050.00
				\$8,050.00
6/24/2011		\$5,000.00		\$3,050.00
<del>-</del>				\$3,050.00

Can you please review this and get back to us.

Sharon

### Payment Chart for Sharon Solomon for legal services of the Law Offices of Jonathan Bell

	61				Balance
Date	Check#	Invoice#	Payment	Invoice	Due
					0
				\$0.00	\$0.00
11/22/2011	1034		\$5,000.00		-\$5,000.00
2/10/2011		20010		\$14,925.00	\$9,925.00
3/7/2011	1035		\$5,000.00		\$4,925.00
					\$4,925.00
4/8/2011		20020		\$8,125.00	\$13,050.00
4/28/2011	1036		\$5,000.00		\$8,050.00
6/24/2011	1037		\$5,000.00		\$3,050.00
7/11/2011		20037		\$25,498.89	\$28,548.89
7/28/2011	1038		\$5,000.00		\$23,548.89
			_		\$23,548.89
					\$23,548.89
Balance			\$25,000.00	\$48,548.89	\$23,548.89

Subject

Solomon Trial

From

JFKLEGAL@aol.com

Date

Tuesday, August 2, 2011 4:24 pm

To

esoterictoo@optonline.net

Mrs. Solomon,

Thank you for making a payment toward your account last week. As the trial nears, there still remains a relatively large balance. I hope you excuse this suggestion but have you ever considered applying to the teachers credit union for a credit card. It is a relatively low interest rate with a high limit. You could satisfy your debt with us and then pay that card off in manageable monthly increments over time.

Again, this is a respectful suggestion.

Joseph F. Kilada Attorney at Law 666 Old Country Road, Suite 600 Garden City, New York 11530 516-222-0454 (P) 516-745-0596 (F) jfklegal@aol.com

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